



Via: comments-pacificnorthwest-wallowa-whitman@fs.fed.us

July 3, 2019

Bill Gamble, District Ranger
La Grande Ranger District,
Wallowa Whitman National Forest
3502 Highway 30
La Grande, OR 97850

Dear Bill,

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments on the Two Eagle Vegetation Management Project (Two Eagle) draft environmental assessment (EA).

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Wallowa Whitman National Forest and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Oregon forest sector employs approximately 61,000, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

AFRC comments on the Two Eagle project are below.

Purpose and Need

Our members depend on a predictable and economical supply of timber products off Forest Service lands to run their businesses and to provide useful wood products to the American public. The treatments on the Two Eagle project will likely provide short-term products for the local industry and we want to ensure that this provision is an important consideration for the decision maker as the project progresses. As we will discuss later in this letter the importance of our members' ability to harvest and remove these timber products from the timber sales generated off this project is paramount. We would like the Forest Service to recognize this

importance by adding a statement to the purpose and need in Two Eagle to clearly articulate the importance of **contributing to economic viability and support to the local infrastructure**. Focused projects, such as Two Eagle, still rely on a viable forest products infrastructure to help pay for projects and to remove some of the millions of tons of material that are generated by these projects. AFRC fully recognizes that the “purpose” of the Two Eagle project is focused on enhancing winter recreation opportunities at the Ski Bluewood recreation area. However, this enhancement will require the efforts of the forest products industry and there is an urgent “need” to keep that industry in business.

Supporting and retaining local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service land. The consideration of active management on every acre of appropriate land, regardless of its land allocation, is important to our membership as each year’s timber sale program is a function of the treatment of aggregate forested stands across the landscape.

Forest Plan Amendments

AFRC supports project specific forest plan amendments as appropriate including treatments in aspen clones, riparian reserves, Late and Old Structure (LOS) stands and removal of trees greater than 21 inches at DBH regardless of species. Alternative D on Two Eagle would allow for removal of white fir trees up to 30 inches at dbh. Alternative D, while still revenue negative for the project as a whole, has the least monetary shortfall making it the most realistic of the alternatives for selling the project and achieving the purpose of the project.

Economics and Operating Restrictions

The timber products provided by the Forest Service are crucial to the health of our membership and local economy. Without the raw material sold by the Forest Service, these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland. To be clear, we are advocating that you consider the economic viability of the project and make sure that it is designed in a way that makes sense for the market. This is not the same thing as maximizing economic value of the project.

One of the primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to manage their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EAs, EISs, and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We urge the Umatilla to shift methods for protecting resources from that of firm prescriptive restrictions that are described in the EA to one that

focuses on descriptive end-results. There are a number of operators that work in the Umatilla market area with a variety of skills and equipment and a wealth of operational knowledge.

AFRC *strongly recommends* that the extremely specific detail on both logging systems and logging process and implementation be removed from the Two Eagle EA. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of operators and the level of specificity in the Two Eagle EA including logging systems, skyline road layout, landing size has a very real potential to create a project that is not only revenue negative but will not sell. The Boise National Forest recently offered the Bogus Basin Ski area project no bids were received due to the specificity and requirements for operations. It is absolutely critical that all units that contain skyline yarding be identified as “skyline/tractor” in contracts and be analyzed for both skyline and ground-based logging during the environmental analysis to provide maximum flexibility during implementation. This flexibility allows our members to work with Forest Service personnel to achieve the best environmental results on the ground and will maximize the returns to the agency for timber removed. Has industry been contacted for input on potential logging systems and logging logistics for the Two Eagle project?

AFRC recommends that the Two Eagle EA analyze for pre-bunching logs to skyline corridors to help with the negative economics on the project. The EA should provide the objectives and on the ground results required from the implemented project. Perhaps a contract vehicle such as an integrated resource service contract, or an integrated resource timber contract (if the value of the material removed appears to be greater than the work required) should be considered. By utilizing these types of tools the Forest Service will have the opportunity to select the proposal that best meets all the criteria that are critical to the success of the project.

Please remove Section 2.6 Design Elements and Mitigation Measures (page 9) and place it in the appendices. This level of detail, some of which are standard best management practices, does not belong in the body of the EA. NEPA is a procedural statute. It requires only that environmental consequences of an action be analyzed and disclosed.

Riparian Area Treatment

AFRC urges the Forest Service to consider proactive management in riparian reserves/riparian conservation areas. Typically, the overstocked and uniform stand characteristics that exist in the uplands also exist in the riparian areas. It has been well documented that thinning in riparian areas accelerates the stand’s trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of small diameter suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the Forest Service to focus their riparian reserve treatments on a variety of native habitats. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that INFISH mandates should be considered.

Roads

Constructing forest roads is essential if active management is desired. Proper road design and layout should pose little to no negative impacts on water quality or slope stability. Consistent and steady operation time throughout the year is important for our members not only to supply a steady source of timber for their mills, but also to keep their employees working. These two values are intangible and hard to quantify as dollar figures in a graph or table, but they are important factors to consider. The ability to yard and haul timber in the winter months will often make the difference between a sale selling and not.

AFRC urges the Forest Service to utilize existing road beds and closed roads for temporary road construction required to access the Two Eagle Project area whenever possible. Generally, we do not support permanently decommissioning roads and removing them from the system as these roads are often necessary for future access and management activities. Utilizing other methods to prohibit use of these roads, such as gates and barriers, is a much better use of limited dollars while providing flexibility for unknown future needs on the landscape.

Climate Change

Carbon sequestration as it relates to climate change is a topic that often gets broadly analyzed in NEPA documents. The analysis that the Forest Service will likely be conducting through the ensuing environmental analysis will discuss forest health benefits, effects on carbon sequestration and storage potential and meeting the purpose and need all within the context of an economically viable timber sale. Two Eagle consists of a variety of treatments, including precommercial and commercial thinning, which may affect the treated stands ability to resist, respond, or be resilient to climate change in the project area. The direct, indirect, and cumulative effects of carbon sequestration and storage and its relationship to climate change in regard to this project must be viewed at much larger scales than the general project area because the scientific literature regarding these, only support analysis on larger scales. There is a large body of literature on management strategies that have the greatest carbon sequestration benefit. In general, actively managing the forest will produce a positive net increase in carbon sequestration thus a positive benefit to reducing anthropogenic effects on climate change (IPCC, 2007). AFRC urges you to analyze the type of treatments being proposed and determine through the literature how they will affect carbon sequestration potential through time.

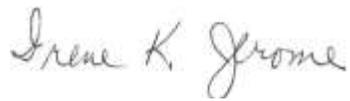
Alternative Selected

AFRC supports selection and implementation of Alternative D: Modified Proposed Action – Cutting of Large Trees. Page 8 of the EA provides the following summary of Alternative D: “This alternative allows cutting grand fir trees up to 30 inches DBH where appropriate to improve tree species composition and stand resiliency. It is expected that some grand fir trees of this size range would remain, and all grand fir trees over 30 inches DBH would remain. Trees over 30 inches would be retained for their wildlife habitat value and aesthetic value in the ski area and viewshed. In addition, all other tree species over 21 inches DBH would remain. Most likely, larger fir trees up to 30 inches DBH would be removed from within old forest multistory stands in the grand fir and spruce cover types (450 acres). These stands would remain old forest structure, but convert to old forest single story in a slightly different manner than in Alternatives A and B. This allows more flexibility in determining how to best thin each stand. Overall, Alternative D has the most skyline logging proposed and the least amount of helicopter logging and affects 20 fewer acres in the project area than Alternatives A and B Based

on field reviews, some units originally identified were expanded, some were dropped, and two were added. Some non-commercial prescriptions shifted to commercial to remove some trees over 5 inches DBH of less-desired tree species or tree quality. Treatments would occur over 1-15 years the same as Alternative A and B.” Alternative D provides the best return to the government and the public, provides the most flexibility for thinning and logging stands and provides the best opportunity for achieving the purpose and need of the project.

I look forward to the next steps in the planning process on the Two Eagle project, which has the potential to provide significant ecological, social and ecological benefits to the local area and the region. Please feel free to contact me if I can assist you with determining the economic feasibility of silviculture treatments and logging system requirements.

Sincerely,

A handwritten signature in cursive script that reads "Irene K. Jerome". The ink is dark and the signature is written in a fluid, connected style.

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